

Dear Commissioners

I respectfully offer my comments in support of Petition for Rulemaking RM-10352. This petition requests that the FCC Rules be amended to create a subband for "wide" bandwidth transmission modes in the 1.8-2.0 MHz "160-Meter" amateur radio band.

In the past, the 1.8-2.0 MHz amateur band was used by a small number of operators who could be considered "160-Meter specialists." With a relatively small amount of use, the band required little oversight. This is no longer the case! The 160-Meter band is now used by many active operators, and during periods of high activity, the problem of interference between users of different modes has become a problem. The simple and logical solution to most of these interference issues is to implement the same partition between wide and narrow bandwidth modes that has proven to work well on other HF and VHF amateur bands. The following notes support my position:

1. Worldwide usage of the 160-Meter amateur band has increased dramatically. Following the departure of LORAN operation from these frequencies, more countries now permit operation on this band, or have expanded the range of frequencies for amateur radio operation. This expansion of operating privileges is continuing, as witnessed by an expansion of Japanese amateur radio privileges on this band little more than a year ago.

2. Use of this band has increased even during the peak of the current 11-year sunspot cycle, when propagation at this frequency is less predictable and less reliable than at times of lower solar activity. In the next few years, as propagation improves at lower frequencies, more amateurs will use the 160-Meter band, and current users are likely to increase the time spent operating on this band.

3. New modes have been relatively slow to find extensive use on the 160-Meter band. But, this is now changing as overall activity increases. This is an opportune time to institute a band usage regulation that will best accommodate these new modes, along with traditional modes.

4. While voluntary band plans are useful, they do not have the force of law and are not adhered to by all amateur radio operators. Despite a formal bandplan supported by the American Radio Relay League, there is still much wide bandwidth (SSB or AM) operation below 1.843 MHz. FCC enforcement of interference disputes will be simplified by regulatory divisions between operating modes.

Finally, I would support a modification to RM-10353 for a "wide mode" subband extending from 1.850 to 2.000 MHz. I believe that a somewhat larger exclusively "narrow mode" subband would better accommodate new narrowband digital modes such as PSK-31 and the various MFSK modes. This division is also consistent with the "even number" divisions of other amateur subbands.

Respectfully submitted,

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